

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-00041-JL-01

**DEFENDANT'S COMMENT ON GOVERNMENT'S PROPOSED
RELEASE CONDITIONS PLEADING**

1. As to Paragraph #1 of the Government's pleading, the Defendant agrees.
2. All comments set forth in Government's Paragraph #2 were already expressed during the hearing.
3. All comments set forth in Paragraph #3 were covered at the hearing.
4. The Defendant agrees that this Court requested proposed conditions of release.
5. The Defendant is a medical marijuana card holder. He has never had a drug addiction problem. He has never had an alcohol problem.
6. The Defendant understands the no-contact provision.
7. The Government has already stated its concern in Paragraph #7. This Court has recognized that the Defendant has never failed to appear for any Court proceeding. In fact, this Court could not find that he posed a flight risk merely based on the Government's "concern." The Defendant would agree with reasonable conditions of home confinement. He would be able to confirm his whereabouts by check in procedures with Probation, including him literally videoing himself at his home upon requests.

8. The subject of cash bail was discussed with the Government on May 11, 2021. The discussion was with Attorney Aframe and Attorney Kennedy. It was agreed that the Government would request a \$200,000 cash bail and the Defendant would request a \$100,000 cash bail, leaving the actual amount to be set by this Court.

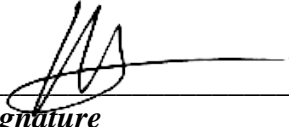
9. The Defendant understands the Government's concerns in its Paragraph #9 and looks forward to working with U.S. Probation to clarify appropriate computer usage.

10. The Defendant is willing and able to comply with reasonable conditions and maintains that the conditions requested are sufficient to guarantee his presence at trial and would safeguard the community.

Respectfully submitted,

May 13, 2021

Date



Signature

Mark L. Sisti

Print Name

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Address

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City

State

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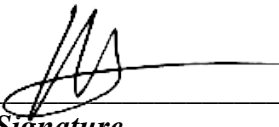
Phone Number

CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Assistant United States Attorneys Georgiana MacDonald, Seth Aframe, and John Kennedy, electronically through EFC on May 13, 2021.

May 13, 2021

Date



Signature

Mark L. Sisti

Print Name